

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
ELIZABETH D. KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7298
Facsimile: (415) 436-6748
elizabeth.kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN DOE,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States of America, *et al.*,

Defendants

) Case No. 25-03140 JSW

) **STIPULATION TO EXTEND TIME TO ALLOW**
) **THE PARTIES TO ENGAGE IN**
) **NEGOTIATIONS FOR A POTENTIAL**
) **RESOLUTION; [PROPOSED] ORDER**

S.Y., *et al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of the United States Department of
Homeland Security, *et al.*,

Defendants

) Case No. 4:25-cv-3244-JSW

ZHOUER CHEN, *et al.*

Plaintiff,

v.

) Case No. 4: 25-cv-3292-JSW

STIPULATION
4:25-CV-03140 JSW and related cases

1 KRISTI NOEM, *et al.*,

2 Defendants

4 SHANGSHANG WANG,

6 Plaintiff,

7 v.

8 KRISTI NOEM, *et al.*,

9 Defendants

11 JUNGWON KIM, *et al.*,

12 Plaintiff,

13 v.

14 KRISTI NOEM, *et al.*,

15 Defendants

16 W.B.

17 Plaintiff,

18 v.

19 KRISTI NOEM, *et al.*,

20 Defendants

23 SKY QUI,

24 Plaintiff,

25 v.

26 TODD M. LYONS, in his official capacity as
27 Acting Director of United States Immigration and
Customs Enforcement,

28 Defendant.

Case No. 4:25-cv-3323-JSW

Case No. 4:25-cv-3383-JSW

Case No. 4:25-cv-3407-JSW

Case No. 4:25-cv-3475-JSW

STIPULATION

4:25-CV-03140 JSW and related cases

EMMA BAI,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants

Case No. 4:25-cv-3481-JSW

J.C. *et al.*,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3502-JSW

ARYAN SHAH, *et al.*,

Plaintiff,

v.

TODD M. LYONS,

Defendant.

Case No. 4:25-cv-3549-JSW

YIWEI HE,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3480 JSC

STIPULATION

4:25-CV-03140 JSW and related cases

On May 6, 2025, the Court granted the parties stipulation to an extension of time for Defendants' supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the deadline for Defendants' opposition on May 7, 2025, at 5:00 p.m. *See* Dkt. No. 55. The Court noted that "[t]here shall be no further extensions." *Id.*

Following the Court's order, Plaintiffs and Defendants have been actively engaged in negotiations for a potential resolution of these cases. The parties are negotiating in good faith but will need a brief period of additional time to determine if they can reach an agreement. Accordingly, the parties respectfully request the Court to grant an extension of time for Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' opposition to May 8, 2025, at 5:00 p.m. The parties are mindful of the Court's order and make this request because they believe it will benefit the parties and conserve the Court's resources to allow a brief period of additional time for the parties to pursue a potential resolution.

For *He v. Noem*, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for their joint status report to May 8, 2025. The parties respectfully request that the Court grant their stipulation.

Dated: May 7, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

s/ Elizabeth D Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendants

Dated: May 7, 2025

s/ John Nicholas Sinodis
JOHN NICHOLAS SINODIS
Van Der Hout, LLP

Attorney for Plaintiffs

s/ Andre Y. Bates
ANDRE Y. BATES
DeHeng Law Offices PC

Attorney for Plaintiff

s/ Jesse M. Bless
JESSE M. BLESS
Bless Litigation

Attorney for Plaintiffs

s/ Brad Banias
BRAD BANIAS
Banias Law

Attorney for Plaintiffs

s/ Ben Loveman
BEN LOVEMAN
Reeves Immigration Law Group

Attorney for Plaintiff

s/ Zachary R. New
ZACHARY R. NEW
Joseph and Hall P.C.

Attorney for Plaintiff

[PROPOSED] ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental opposition to Plaintiffs' motion for preliminary injunction by May 8, 2025, at 5:00 p.m.

Date:

JEFFREY S. WHITE
United States District Judge